

DOCUMENTING OPEN BURNS

Purpose This Air Quality Group procedure describes the process to notify the New Mexico Environment Department (NMED) regulators and document an open burn event at LANL.

Scope This procedure applies to the individuals in the Air Quality Group assigned to notify regulators, track, observe, and document open burns at LANL.

In this procedure This procedure addresses the following major topics:

Topic	See Page
General Information About This Procedure	2
Who Requires Training to This Procedure?	2
Notification and Documentation of Open Burns	4
Annual Report of Open Burns	7
Records Resulting from This Procedure	8

Signatures

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07/01/99

CONTROLLED DOCUMENT

This copy is uncontrolled if no signatures are present or if the copy number stamp is black. Users are responsible for ensuring they work to the latest approved revision.

General information about this procedure

Attachments This procedure has the following attachments:

Number	Attachment Title	No. of pages
1	Open Burn Notification Log	1
2	Open Burn Notification Form	1
3	Open Burn Review and Observation Report	1

History of revision This table lists the revision history and effective dates of this procedure.

Revision	Date	Description Of Changes
0	5/28/99	New document.
1	7/1/99	Change training method to “reading.”

Who requires training to this procedure? The following personnel require training before implementing this procedure:

- Title V project leader
- Personnel assigned to track observe, document, and report open burns

Training method Training to this procedure will be by “self-study” (reading) and will be documented in accordance with the procedure for training (ESH-17-024).

Prerequisites In addition to training to this procedure, the following training is also required prior to performing this procedure:

- ESH-17-011, “Logbook Use and Control”
- Familiarity with the operational open burn permit

Hazard Control Plan The Hazard Control Plan that documents the hazards of work described in this procedure is:

- ESH-17-306, R1

This plan is on file in the ESH-17 group office.

General information, continued

**Definitions
specific to this
procedure**

None.

References

The following documents are referenced in this procedure:

- ESH-17-011, “Logbook Use and Control”
- ESH-17-024, “Personnel Training”

Note

Actions specified within this procedure, unless preceded with “should” or “may,” are to be considered mandatory guidance (i.e., “shall”).

Notification and documentation of open burns

Permitted sources for open burns

The lab conducts two types of “open burns”: *prescribed* and *operational*. One air quality permit (AQB.97.214) with NMED currently permits operational “open burning.” The other air quality permit with NMED permits specific prescribed burns. Reporting and documentation requirements for prescribed burns will be specified in the specific current permits and are not addressed in this procedure.

Performing work safely

DO NOT perform work under conditions you consider unsafe. Before beginning work described in this procedure, review safety needs and requirements, identify hazards, and develop hazard mitigation measures. Be aware that facility configurations and hazards may change between visits.

Stormy weather - Reschedule or delay work activities as necessary to avoid areas experiencing severe or dangerous weather.

First notification

Initiation of the open burn process occurs when a call, FAX, or e-mail comes from any of the operations people at the permitted burn areas. Notifications are usually sent to the Title V Project Leader or the group member who keeps the logbook.

Enter information regarding the burn on a line of the appropriate Open Burn Notification Log (Attachment 1) in the Open Burn Logbook and complete the top portion of an Open Burn Review and Observation Report (Attachment 3).

NOTE: The offices at the sites should inform ESH-17 with enough advance notice to allow notification of NMED 24 hours prior to the burn.

Notify NMED

The burn permit requires that the NMED Enforcement Officer be notified at least 24 hours before the burn. This should be done at the time the logbook entry is made. In addition to the phone call, FAX an Open Burn Notification Form (Attachment 2) to the NMED enforcement office.

Place records in logbook

When the Open Burn Notification Form has been faxed, put it and the FAX transmission activity sheet in the logbook under the heading for the burn.

Notification and documentation of open burns, continued

Site access requirements

Before going to the TA-14 (Q-Site) burn cage, clearance (sign-in) must be obtained from the DX-2 Group Office at TA-9, Building 21, room 128.

To get to the TA-11 or TA-16 burn grounds, clear through the Explosives Area Badge Control Office in TA-8 Building 202.

Before going to TA-36, go to the DX-DO office at TA-8 to obtain clearance into R site area.

Complete observation form

Observations of the burn by Air Quality Group personnel are not required by the Air Quality Permit but are done whenever possible.

If the burn is observed, complete the lower part of the Open Burn Review and Observation Report (Attachment 3) to record pertinent information and any relevant comments during the burn. Insert this form into the logbook.

If the burn is NOT observed, indicate such on the lower part of the Open Burn Review and Observation Report (Attachment 3). Insert this form into the logbook.

Record conducted burn

After the burn has been conducted, the operating group will send a FAX report of the burn, giving actual amounts disposed of and amounts of fuel used to initiate the burn. Place this FAX record into the log with the other paper records.

Ensure the following records are filed in the logbook (these four papers comprise the official legal description and record of the burn):

- Open Burn Notification Form (Attachment 2)
- FAX transmission activity sheet
- Open Burn Review and Observation Report (Attachment 3)
- Fax record of burn from operating group

Notification and documentation of open burns, continued

Cancellation of a burn

It is not required by the permit to inform the NMED of a cancelled burn, but if that is not done, there is the possibility of later confusion as to the number of actual burns. When the burn is rescheduled, the NMED must again be notified, and this could cause a double count for that burn in their records. Document any cancellations in the logbook to help prevent future confusion.

Annual report of open burns

Annual report of burns The Air Quality Group makes a report once yearly to the NMED for all permitted burn activities throughout the year. The permit requires only “annual” reporting – no date for the report is specified. The Title V project leader may determine the date of the report submittal.

Prepare report Use the data in the open burn logbook to compile information for the past calendar year. Verify the information with the appropriate group that conducted the open burn operations.

No specific format for the letter is required; follow the previous year’s report as a guide. Include the following information in the report (additional information may be included at the discretion of the Title V project leader):

- Burn location
 - Burn type
 - Burn date
 - Fuel type
 - Fuel quantity
-

Transmit report Send the letter to the NMED Air Quality Bureau.

Send a copy of the report to the ESH-17 Records Coordinator.

Records resulting from this procedure

Records

The following records generated as a result of this procedure are to be entered into the Open Burn logbook (**NOTE:** logbooks are controlled according to requirements in ESH-17-011):

- Entries in Open Burn Notification Log (Attachment 1)
- Open Burn Notification Form (Attachment 2)
- FAX transmission activity sheet
- Open Burn Review and Observation Report (Attachment 3)
- Fax record of burn from operating group

The following record generated as a result of this procedure is to be submitted **within two weeks of completion** to the Records Coordinator:

- Annual report to the NMED of open burns

Air Quality Group
Los Alamos National Laboratory

Air Quality Group

OPEN BURN NOTIFICATION LOG

Permit no. AQB.97.214 (

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Air Quality Group
OPEN BURN NOTIFICATION FORM

This form is from ESH-17-306

Los Alamos National Laboratory
ESH-17
AIR QUALITY GROUP

P. O. BOX 1663, MAIL STOP J978

Los Alamos National Laboratory
Los Alamos, NM 87544

Phone: (505) 665-8855

Fax: (505) 665-8858

Memorandum

DATE: _____ **TO:** *New Mexico Environment Department*
Air Quality Bureau
Phone Number: (505) 827-1494
Fax Number: (505) 827-1523

Attention: Enforcement Officer

SUBJECT: *OPEN BURN NOTIFICATION*

FROM: _____

Technical Area: _____ **Operation:** _____

Proposed Burn Date: _____

Comments: _____

For further information please call the Air Quality Group at 665-1240.

This form is from ESH-17-306

Date:	Person calling:	Group:
Location of burn:		Requested burn date:
Description of burn:		
Notifications (person and date notified)		
DOE:		NMED:
On-Site preview		
Check if present:		
<input type="checkbox"/> Hazardous chemicals / materials	<input type="checkbox"/> Cans – trash	
<input type="checkbox"/> Dirt and sand in fuel pile	<input type="checkbox"/> Visible explosive material	
Signature	Name (print)	Date
Comments:		
Signature	Name (print)	Date
Observation of burn:		
Comments on burn:		
Signature	Name (print)	Date

Air Quality Group

OPEN BURN NOTIFICATION LOG

Permit no. AQB.97.214 (

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OPEN BURN REVIEW AND OBSERVATION REPORT

This form is from ESH-17-306

Date:	Person calling:	Group:
Location of burn:		Requested burn date:
Description of burn: <hr/> <hr/>		
Notifications (person and date notified) DOE: _____ NMED: _____		
On-Site preview Check if present: <input type="checkbox"/> Hazardous chemicals / materials <input type="checkbox"/> Cans – trash <input type="checkbox"/> Dirt and sand in fuel pile <input type="checkbox"/> Visible explosive material		
_____ Signature	_____ Name (print)	_____ Date
Pre-burn comments: <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> _____ Signature _____ Name (print) _____ Date		
Observation of burn: Comments on burn: <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> _____ Signature _____ Name (print) _____ Date		